

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

FILED
U.S. DISTRICT COURT
EASTERN DISTRICT OF TEXAS

JUL 11 2012

DAVID J. MALAND, CLERK

BY
DEPUTY

NO. 4:12CR 159
Judge *Crone*

UNITED STATES OF AMERICA §
v. §
CHARLES WILLIAMS (1) §
JARROD J. WILLIAMS (2) §
JULIUS WILLIAMS (3) §
JEMILAT A. WILLIAMS (4) §
CHRISTOPHER CARTER(5) §

INDICTMENT

THE UNITED STATES GRAND JURY CHARGES:

Count One

Violation: 18 U.S.C. § 1349
(Conspiracy to Commit Mail Fraud and
Wire Fraud in violation of 18 U.S.C. §§
1341 and 1343, respectively)

Introduction

At all times material to this Indictment:

1. Defendants **Charles Williams** (“Charles”), **Jarrold J. Williams** (“Jarrod”), **Julius Williams** (“Julius”), and **Jemilat A. Williams** (“Jemilat”) controlled and operated Applied Investment Strategies, Inc. (“AIS”).

2. AIS maintained a physical place of business at 405 Rouen in McKinney, Texas, in the Eastern District of Texas, and a registered location of P.O. Box 866901 in Plano, Texas, in the Eastern District of Texas.

3. AIS marketed itself as a foreclosure rescue service and solicited residential homeowners who were at risk of foreclosure (“at-risk homeowners”) through street signs, flyers, and targeted call lists. In its advertising, AIS claimed to “buy houses” and “take over payments” and claimed expertise in “loan modifications” and “solving quick sale needs.”

4. The following business entities were lending institutions or entities that were affiliated with lending institutions (collectively “Lending Institutions”) that funded or assisted with the funding of mortgage loans or other types of loans: Aurora Bank FSB; Bayview Loan Servicing; J.P. Morgan Chase Bank; Washington Mutual; and Wells Fargo Bank.

5. The Servicemember’s Civil Relief Act (“SCRA”), 50 U.S.C. § 501, et seq., provides certain protections for individuals called to active duty in the military and deployed servicemembers, namely the abeyance of civil collection efforts with respect to payments for outstanding mortgage loans, credit cards, and other loans.

The Conspiracy and its Objects

6. Between on or about February 14, 2007, and on or about June 19, 2012, in the Eastern District of Texas and elsewhere, **Charles, Jarrod, Julius, and Jemilat** knowingly and willfully conspired, confederated, and agreed with each other and with other individuals both known and unknown to the United States Grand Jury, to devise a scheme and artifice to defraud the Lending Institutions and the at-risk homeowners and to obtain money from the Lending Institutions and the at-risk homeowners by making materially false and fraudulent pretenses, representations, and promises, and for the purpose of executing and attempting to execute the scheme and artifice: (1) caused matter to be sent or delivered by the United States Postal Service and by private and commercial interstate carriers, a violation of 18 U.S.C. § 1341; and (2) caused writings, signs, and

signals to be transmitted by means of wire communication in interstate commerce, a violation of 18 U.S.C. § 1343.

Purpose of the Conspiracy

7. The purpose of the conspiracy was to defraud at-risk homeowners by fraudulently acquiring their houses and to defraud Lending Institutions by inducing them to forestall mortgage loan collection efforts by using false military orders to trigger the protections of the SCRA. The conspirators then used the fraudulently obtained houses for personal gain and for the growing of marijuana plants for use and distribution. A second purpose of the conspiracy was to defraud Lending Institutions by applying for loans to purchase new cars and then inducing the Lending Institutions to forestall loan collection efforts by using false military orders to trigger the protections of the SCRA.

Manner and Means of the Conspiracy

It was part of the manner and means of the conspiracy that:

8. AIS, through **Charles, Jarrod, Julius, and/or Jemilat**, specifically solicited at-risk homeowners by making materially false representations. These false representations were designed to induce the at-risk homeowners to use AIS's services. Among the materially false representations were the following:

- a. That AIS would assist each at-risk homeowner by preventing foreclosure.
- b. That AIS would stop collection efforts by each Lending Institution.
- c. That AIS would rent each at-risk homeowner's property to a tenant, collect the rents, and make the appropriate monthly payments to the Lending Institution.

9. AIS, through **Charles, Jarrod, Julius**, and/or **Jemilat**, also intentionally failed to disclose material facts to each at-risk homeowner. Among the intentional omissions of material fact were the following:

- a. That AIS would place each at-risk homeowner's property into a land trust styled in the name of the property address with **Charles, Jarrod, Julius**, and/or **Jemilat** as trustee; however, while the deed of trust was filed with the county in which the property was located, the Lending Institution was not notified of the change in deed.
- b. That AIS would prevent foreclosure on each at-risk homeowner's property by preparing and filing unauthorized and false claims for relief under the SCRA through the use of false military orders in the name of the at-risk homeowner, prepared and provided to each Lending Institution without the at-risk homeowner's knowledge or authorization.

10. **Charles** created templates for false military orders, letters, and memoranda and provided them to **Jarrold**.

11. AIS, through **Charles, Jarrod, Julius**, and/or **Jemilat**, made materially false representations by interstate wire transmission and mail delivery to each of the Lending Institutions in order to stop collection efforts. Specifically, AIS, through **Charles, Jarrod, Julius**, and/or **Jemilat**, took the following actions:

- a. AIS, through **Charles, Jarrod, Julius**, and/or **Jemilat** prepared a materially false military order, letter, or memorandum claiming that each at-risk homeowner was a member of the Army National Guard or the Texas National Guard, that the at-risk homeowner was currently on active duty, and that the at-risk homeowner was deployed as part of military operations in Iraq or Afghanistan.
- b. AIS, through **Charles, Jarrod, Julius**, and/or **Jemilat**, prepared each materially false military order, letter, or memorandum without the at-risk homeowner's authorization, consent, and knowledge.

- c. AIS, through **Charles, Jarrod, Julius**, and/or **Jemilat**, submitted each materially false military order, letter, or memorandum to a Lending Institution by facsimile or mail.
- d. In a follow-up written or telephone communications with each Lending Institution, **Charles, Jarrod, Julius**, and/or **Jemilat** posed as a high-ranking member of the military in order to authenticate each materially false military order, letter, or memorandum.
- e. **Charles, Jarrod, Julius**, and/or **Jemilat** contacted a Lending Institution and changed the mailing address for each at-risk homeowner property to one of the following six addresses, so that the at-risk homeowner, the tenant, and the financial institution remained unaware of the scheme: (i) P.O. Box 6066 in McKinney, Texas, in the Eastern District of Texas; (ii) P.O. Box 866901 in McKinney, Texas, in the Eastern District of Texas; (iii) 400 W. Eldorado Parkway in McKinney, Texas, in the Eastern District of Texas; (iv) 6841 Virginia Parkway, Suite 103, in McKinney, Texas, in the Eastern District of Texas; (v) 405 Rouen Drive in McKinney, Texas, in the Eastern District of Texas; and (vi) 7301 Burnet Road, No. 102-370 in Austin, Texas. The Lending Institutions mailed correspondence related to each at-risk homeowner property to one or more of these addresses.

12. The conspiracy and scheme to defraud included but was not limited to the following

38 properties:

Street No.	Street Name	City and State
1531	Summerfield Drive	Allen, Texas
12000	Melrose Lane	Frisco, Texas
1856	Nighthawk Drive	Frisco, Texas
9658	Windy Ridge Drive	Frisco, Texas
4625	Chapel Creek Drive	Plano, Texas
636	Tumbleweed	Plano, Texas
1006	S. Wellington Point Road	McKinney, Texas
405	Rouen Drive	McKinney, Texas
4308	Foxtrail	McKinney, Texas
4500	Leeds Drive	McKinney, Texas

4511	Buena Vista Lane	McKinney, Texas
5913	Spring Hill Drive	McKinney, Texas
809	Glendevon	McKinney, Texas
518	Nunnalee	Van Alstyne, Texas
1556	Vida Court	Dallas, Texas
1615	Herald Street	Dallas, Texas
1623	Fordham Road	Dallas, Texas
2006	Millmar	Dallas, Texas
239	Hillburn	Dallas, Texas
2430	Anzio Drive	Dallas, Texas
3104	Springview Avenue	Dallas, Texas
3418	Gladiolous	Dallas, Texas
6838	Pemberton Drive	Dallas, Texas
218	N. Beacon St. 101	Dallas, Texas
1239	Holt Avenue	Desoto, Texas
216	East Santa Fe	Farmersville, Texas
410	Blue Ridge Blvd.	Duncanville, Texas
913	Mill Branch Drive	Garland, Texas
7005	Falling Springs Rd.	Fort Worth, Texas
10211	Landsend	Houston, Texas
11016	Panther Court	Houston, Texas
10917	Panther Court	Houston, Texas
10918	Panther Court	Houston, Texas
10915	Pompton	Houston, Texas
408	W. 16th Street	Houston, Texas
9511	Tallow Court	Missouri City, Texas
416	Glenarm Avenue	Baltimore, Maryland
4408	Meadow Lane Drive	Jackson, Mississippi

13. **Charles, Jarrod, Julius**, and/or **Jemilat** caused losses to financial institutions through lost interest on mortgage loan payments, damage to the property, and tax and insurance payments made on behalf of the property.

14. **Charles, Jarrod, Julius**, and/or **Jemilat** profited from the scheme in numerous way, including by retaining rental payments from tenants, by stripping at-risk homeowner properties of fixtures and appliances in order to file false insurance claims, by fraudulently obtaining government assistance payments for at-risk homeowner properties, and by living in the homes free of charge.

15. **Charles, Jarrod**, and **Julius** used the fraudulently-acquired property located at 518 Nunnalee in Van Alstyne, Texas, in order to grow marijuana plants for use and distribution.

16. **Jemilat** obtained a mortgage loan by making false material statements on a Uniform Residential Loan Application and related supporting materials in order to induce one or more Lending Institutions to extend a mortgage loan regarding the property located at 408 W. 16th Street in Houston, Texas.

17. **Charles, Jarrod, Julius** and/or **Jemilat** submitted materially false military orders, letters, or memoranda to Lending Institutions by fax or mail in order to induce the Lending Institutions into stopping collection efforts for automobile loans.

18. On or about the following dates with respect to the following properties, as representative of the manner and means of the conspiracy and in furtherance and execution and attempted execution of the conspiracy, in the Eastern District of Texas and elsewhere, the following co-conspirators took the following actions:

- a. With respect to the property located at 1006 S. Wellington Point Road in McKinney, Texas, in the Eastern District of Texas:
- (1) In or about August 2007, **Jarrold** falsely informed Washington Mutual that he was eligible for relief from mortgage loan payments pursuant to the SCRA.
 - (2) On or about January 14, 2008, **Jarrold** falsely informed Washington Mutual by letter that he was eligible for relief pursuant to the SCRA from additional loans that he held with J.P. Morgan Chase and Subaru Motors.
 - (3) On or about February 12, 2009, **Jarrold** falsely informed Washington Mutual by facsimile from McKinney, Texas, in the Eastern District of Texas, to South Carolina, that he was eligible for relief from mortgage loan payments pursuant to the SCRA. In support of his request, **Jarrold** included false military orders and verification contact information for **Charles**.
 - (4) J.P. Morgan Chase Bank acquired the mortgage loan from Washington Mutual, and in reliance on the false material statements made by **Jarrold** and **Charles**, J.P. Morgan Chase Bank exempted **Jarrold** from mortgage loan payments that were due and owing.
- b. With respect to the property located at 408 W. 16th Street in Houston, Texas:
- (1) On or about February 14, 2007, **Jemilat** caused to be submitted to Aurora Bank FSB a Uniform Residential Loan Application that contained the following false materially representations: that **Jemilat** was employed by Waste Management as a senior IT Technician, that she had a monthly income of \$13,283, and that she intended to live in the property as a primary residence. **Jemilat** also failed to disclose the material fact that she owned additional real estate.
 - (2) On or about February 14, 2007, in reliance on the false material representations made by **Jemilat**, Aurora Bank FSB provided \$73,000 to fund the property acquisition.
- c. With respect to the property located at 6838 Pemberton Drive in Dallas, Texas:
- (1) July 30, 2008, **Jarrold** falsely informed Aurora Bank FSB by facsimile from McKinney, Texas, in the Eastern District of Texas to

Nevada, that he was eligible for relief from mortgage loan payments pursuant to the SCRA. In support of his request, **Jarrold** included false military orders.

- (2) On or about April 7, 2009, **Jarrold** falsely informed Aurora Bank FSB by facsimile from McKinney, Texas, in the Eastern District of Texas, to Nevada, that he continued to be eligible for relief from mortgage loan payments pursuant to the SCRA.
 - (3) On or about August 3, 2011, Aurora Bank FSB mailed a letter confirming and granting the SCRA request from Nevada to P.O. Box 6066, McKinney, Texas, in the Eastern District of Texas.
 - (4) On or about January 7, 2012, **Jarrold** falsely informed Aurora Bank FSB by facsimile from McKinney, Texas, in the Eastern District of Texas, to Nevada, that he continued to be eligible for relief from mortgage loan payments pursuant to the SCRA. In support of his request, **Jarrold** included false military orders and verification contact information for **Charles** under the alias "1SG Jack Williams."
 - (5) In reliance on the false material statements made by **Jarrold**, Aurora Bank FSB provided an exemption from mortgage loan payments that were due and owing.
- d. With respect to the property located at 1556 Vida Court in Dallas, Texas:
- (1) On or about May 26, 2009, **Jarrold** falsely informed Aurora Bank FSB by facsimile from McKinney, Texas, in the Eastern District of Texas, to Nevada, that an at-risk homeowner known as LG was eligible for relief from mortgage loan payments pursuant to the SCRA.
 - (2) On or about July 26, 2010, **Jarrold** falsely informed Aurora Bank FSB by facsimile that LG continued to be eligible for relief from mortgage loan payments pursuant to the SCRA. In support of his request, **Jarrold** included false military orders and verification contact information for **Charles** under the alias "1SG Jack Williams."
 - (3) In reliance on the false material statements made by **Jarrold**, Aurora Bank FSB provided an exemption from mortgage loan payments that were due and owing.

e. With respect to the property located at 1239 Holt Avenue in Desoto, Texas:

- (1) On or about August 31, 2009, **Jarrold** falsely informed Aurora Bank FSB by facsimile from McKinney, Texas, in the Eastern District of Texas, to Nevada, that an at-risk homeowner known as PR was eligible for relief from mortgage loan payments pursuant to the SCRA. In support of his request, **Jarrold** included false military orders and verification contact information for **Charles** under the alias "1SG Jack Williams."
- (2) On or about August 3, 2011, Aurora Bank FSB sent a letter confirming and granting the SCRA request from Nevada to P.O. Box 6066, McKinney, Texas, in the Eastern District of Texas.
- (3) On or about February 24, 2012, **Jarrold** falsely informed Aurora Bank FSB by facsimile from McKinney, Texas, in the Eastern District of Texas, to Nevada, that PR continued to be eligible for relief from mortgage loan payments pursuant to the SCRA. In support of his request, **Jarrold** included false military orders and verification contact information for **Charles** under the alias "1SG Jack Williams."
- (4) In reliance on the false material statements made by **Charles** and **Jarrold**, Aurora Bank FSB provided an exemption from mortgage loan payments that were due and owing.

f. With respect to the property located at 3104 Springview Avenue in Dallas, Texas:

- (1) On or about November 12, 2011, **Jarrold** falsely informed Ocwen Loan Servicing by facsimile from McKinney, Texas, in the Eastern District of Texas, to Nevada, that an at-risk homeowner known as PR was eligible for relief from mortgage loan payments pursuant to the SCRA. In support of his request, **Jarrold** included false military orders and verification contact information for **Charles** under the alias "1SG Jack Williams."
- (2) On or about February 24, 2012, **Jarrold** falsely informed Aurora Bank FSB by facsimile from McKinney, Texas, in the Eastern District of Texas, to Nevada, that PR continued to be eligible for relief from mortgage loan payments pursuant to the SCRA. In support of his request, **Jarrold** included false military orders and verification contact information for **Charles** under the alias "1SG Jack Williams."

- (3) In reliance on the false material statements made by **Charles** and **Jarrold**, Aurora Bank FSB provided an exemption from mortgage loan payments that were due and owing.
- g. With respect to the property located at 1531 Summerfield Drive in Allen, Texas:
- (1) On or about June 26, 2008, **Charles** falsely informed Bayview Loan Servicing by facsimile from McKinney, Texas, in the Eastern District of Texas, to Florida, that a homeowner known as SH was eligible for relief from mortgage loan payments pursuant to the SCRA. In support of his request, **Charles** included false military orders and verification contact information for **Charles** under the alias "1SG Jack Williams."
 - (2) In reliance on the false material statements made by **Charles**, Aurora Bank provided an exemption from mortgage loan payments that were due and owing.
- h. With respect to a car loan related to a 2005 Infinity Q35 bearing vehicle identification number JNKCV51E75M216917:
- (1) On or about June 23, 2010, **Julius** falsely informed Wells Fargo Bank by facsimile from McKinney, Texas, in the Eastern District of Texas, to California, that he was eligible for relief from automobile loan payments pursuant to the SCRA. In support of his request, **Julius** included false military orders.
 - (2) On or about March 1, 2009, **Julius** falsely informed Wells Fargo Bank by facsimile from McKinney, Texas, in the Eastern District of Texas, to California, that he continued to be eligible for relief from automobile loan payments pursuant to the SCRA. In support of his request, **Julius** included false military orders and verification contact information for **Charles** under the alias "1SG Jack Williams."
 - (3) On or about November 1, 2011, Wells Fargo Bank mailed a letter from California to 4511 Buena Vista Lane in McKinney, Texas, in the Eastern District of Texas, confirming relief from automobile loan payments pursuant to the SCRA and seeking additional information.
 - (4) On or about December 27, 2011, Wells Fargo Bank mailed a letter from California to 4511 Buena Vista Lane in McKinney, Texas, in the

Eastern District of Texas, confirming relief from automobile loan payments pursuant to the SCRA and seeking additional information.

- (5) In reliance on the false material statements made by **Charles** and **Julius**, Wells Fargo Bank provided an exemption from mortgage loan payments that were due and owing.

In violation of 18 U.S.C. § 1349.

Counts Two through Five

Violation: 18 U.S.C. §§ 1341 and 2
(Mail Fraud and Aiding and Abetting)

Introduction

1. The Grand Jury realleges paragraphs one through eighteen of Count One of the Indictment as if fully set forth herein.

The Scheme and Artifice to Defraud

2. Between on or about February 14, 2007, and on or about June 19, 2012, in the Eastern District of Texas and elsewhere, **Charles, Jarrod, and Julius** devised and intended to devise a scheme and artifice to defraud, as described in paragraphs one through eighteen of Count One of the Indictment, and to obtain money and property by materially false and fraudulent pretenses, representations, and promises, as described in paragraphs eight through eleven of Count One of the Indictment.

Execution of the Scheme and Artifice

3. On or about the following dates and for the purpose of executing and attempting to execute the scheme and artifice to defraud, **Charles, Jarrod, and Julius**, aided and abetted by one another, knowingly caused the following materials to be sent, delivered, and moved by the United States Postal Service and interstate commercial and private carriers to McKinney, Texas, in the Eastern District of Texas:

Count	Date	Property	Material
2	August 3, 2011	6838 Pemberton Drive in Dallas, Texas	Letter from Aurora Bank FSB from Nevada to McKinney, Texas, granting SCRA request.
3	August 3, 2011	1239 Holt Avenue in Desoto, Texas	Letter from Aurora Bank FSB from Nevada to McKinney, Texas, granting SCRA request.
4	November 1, 2011	2005 Infinity Q35 bearing vehicle identification number JNKCV51E75M216917	Letter from Wells Fargo Bank from California to McKinney, Texas, confirming SCRA status and seeking additional information.
5	December 27, 2011	2005 Infinity Q35 bearing vehicle identification number JNKCV51E75M216917	Letter from Wells Fargo Bank from California to McKinney, Texas, confirming SCRA status and seeking additional information.

Each Count in violation of 18 U.S.C. §§ 1341 and 2.

Counts Six through Ten

Violation: 18 U.S.C. §§ 1343 and 2
(Wire Fraud and Aiding and Abetting)

Introduction

1. The Grand Jury realleges paragraphs one through eighteen of Count One of the Indictment as if fully set forth herein.

The Scheme and Artifice to Defraud

2. Between on or about February 14, 2007, and on or about June 19, 2012, in the Eastern District of Texas and elsewhere, **Charles** and **Jarrold** devised and intended to devise a scheme and artifice to defraud, as described in paragraphs one through eighteen of Count One of the Indictment, and to obtain money and property by materially false and fraudulent pretenses, representations, and promises as described in paragraphs eight through eleven of Count One of the Indictment.

Execution of the Scheme and Artifice

3. On or about the following dates and for the purpose of executing and attempting to execute the scheme and artifice to defraud, **Charles** and **Jarrold**, aided and abetted by one another, caused to be transmitted in interstate commerce, by means of a wire communication, the following signs, signals, and sounds:

Count	Date	Property	Material
6	June 26, 2008	1531 Summerfield Drive in Allen, Texas	Facsimile from McKinney, Texas, to Bayview Loan Servicing in Florida making SCRA request.

7	July 30, 2008	6838 Pemberton Drive in Dallas, Texas	Facsimile from McKinney, Texas, to Aurora Bank FSB in Nevada making SCRA request
8	February 2, 2009	1006 S. Wellington Point Road in McKinney, Texas	Facsimile from McKinney, Texas, to Washington Mutual in South Carolina making SCRA request.
9	May 26, 2009	1556 Vida Court in Dallas, Texas	Facsimile from McKinney, Texas, to Aurora Bank in Nevada making SCRA request.
10	November 12, 2011	3104 Springview Avenue in Dallas, Texas	Facsimile from McKinney, Texas, to Ocwen Kloan Servicing in Nevada making SCRA request.

Each Count in violation of 18 U.S.C. §§ 1343 and 2.

Counts Eleven through Seventeen

Violation: 18 U.S.C. §§ 1028A and 2
(Aggravated Identity Theft and Aiding and Abetting)

On or about the following dates, in the Eastern District of Texas, **Jarrod** and **Charles** did knowingly possess and use, without lawful authority, a means of identification of another person, to wit, the following names, during and in relation to violations of 18 U.S.C. §§ 1341, 1343, and 1349 (mail fraud, wire fraud, and conspiracy to commit mail and wire fraud, respectively), as alleged in Count One through Ten of this Indictment, in connection with the following properties:

Count	Name	Street No.	Street Name	City and State
11	FB	12000	Melrose Lane	Frisco, Texas
12	VC	1856	Nighthawk Drive	Frisco, Texas
13	JM	9658	Windy Ridge Drive	Frisco, Texas
14	MC	4625	Chapel Creek Drive	Plano, Texas
15	SS	636	Tumbleweed	Plano, Texas
16	SH	4500	Leeds Drive	McKinney, Texas
17	MB	5913	Spring Hill Drive	McKinney, Texas

Each Count in violation of 18 U.S.C. §§ 1028A and 2.

Count Eighteen

Violation: 21 U.S.C. § 846
(Conspiracy to Possess with Intent to
Distribute Marijuana Plants)

1. The Grand Jury realleges paragraphs one through eighteen of Count One of the Indictment as if fully set forth herein.

2. Between on or about March 10, 2007, through on or about June 19, 2012, in the Eastern District of Texas and elsewhere, **Charles, Jarrod, Julius, and Christopher Carter**, defendants, did knowingly and intentionally combine, conspire, and agree with each other and other persons known and unknown to the United States Grand Jury, to possess with the intent to distribute 1000 or more marijuana plants, a violation of 21 U.S.C. § 841(a)(1).

In violation of 21 U.S.C. § 846.

NOTICE OF INTENT TO SEEK CRIMINAL FORFEITURE

Pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461

As the result of committing a violation of 18 U.S.C. § 1349 as stated in this Indictment, the defendants shall forfeit to the United States all property, real or personal, that constitutes or is derived from proceeds traceable to the aforementioned violations, including but not limited to the following:

Cash Proceeds

\$701.53 in U.S. currency seized from Charles's 2004 Ford F150 pickup truck bearing vehicle identification number 1FTRX14W64NC21733;

Approximately \$1,588,889 in United States currency and all interest and proceeds traceable thereto, in that such sum in aggregate is property constituting, or derived from, proceeds obtained directly or indirectly, as the result of the foregoing offenses alleged in this Indictment, including \$2,120.11 in Bank of America account number xxxxxxxx4586 in the name of Applied Investment Strategies Operation Account;

Personal Property

A 2004 Ford F150 pickup truck bearing vehicle identification number 1FTRX14W64NC21733;

A 1969 Pontiac Firebird, VIN: 223379N111543; and

Substitute Assets

If any of the property described above as being subject to forfeiture, as a result of any act or omission of the defendants:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with a third person;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to 18 U.S.C. § 982(a)(4), to seek forfeiture of any other property of the defendants up to the value of the above forfeitable property, including but not limited to all property, both real and personal owned by the defendants.

By virtue of the commission of the offense alleged in this Indictment, any and all interest the defendants have in the above-described property is vested in and forfeited to the United States.

A True Bill

BJS

Grand Jury Foreperson

Respectfully submitted,

JOHN M. BALES
UNITED STATES ATTORNEY

JK *GP* *7/11/12*

Shamoil T. Shipchandler
Assistant United States Attorney
Texas Bar No. 24028533
101 East Park Boulevard, Suite 500
Plano, Texas 75074
tel: (972) 509-1201
fax: (972) 509-1209
email: shamoil.shipchandler@usdoj.gov

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

UNITED STATES OF AMERICA	§	
	§	
v.	§	
	§	
CHARLES A. WILLIAMS (1)	§	NO. 4:12CR
JARROD J. WILLIAMS (2)	§	Judge
JULIUS WILLIAMS (3)	§	
JEMILAT A. WILLIAMS (4)	§	
CHRISTOPHER CARTER (5)	§	

NOTICE OF PENALTY

Counts One through Ten

Violations: 18 U.S.C. §§ 1341, 1343, 1349

Penalty: For each count, not more than twenty years imprisonment, a fine not to exceed \$250,000, or not more than the greater of twice the gross gain to the defendant or twice the gross loss to one other than the defendant, or both; supervised release of not more than three years.

Special Assessment: \$100.00

Counts Eleven through Seventeen

Violations: 18 U.S.C. § 1028A

Penalty: For each count, two years imprisonment in addition to the punishment provided by the predicate felony; a fine not to exceed \$250,000, or not more than the greater of twice the gross gain to the defendant or twice the gross loss to one other than the defendant, or both; supervised release of not more than one year.

Special Assessment: \$100.00

Count Eighteen

Violation: 21 U.S.C. § 846

Penalty: Not less than ten years and not more than life imprisonment, a fine not to exceed \$10,000,000; supervised release of at least five years.

Special
Assessment: \$100.00